

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

MERSADIES BONILLA

Plaintiff

v.

AMERICAN HERITAGE FEDERAL CREDIT
UNION; BRUCE FOLUKE; DANIELLE

BASICH; and

BRANCH MANAGER UNKNOWN

Defendants

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CIVIL ACTION NO. – LAW

NOTICE OF REMOVAL OF ACTION

Pursuant to 28 U.S.C. §1441, Defendants, American Heritage Federal Credit Union, Bruce Foulke, and Danielle Basisch, file this Notice of Removal of the present case from the Court of Common Pleas of Philadelphia County, Pennsylvania, in which it is now pending, to the United States District Court for the Eastern District of Pennsylvania, and aver as follows:

1. On or about April 23, 2020, Plaintiff filed a Complaint in the Court of Common Pleas of Philadelphia County, captioned Bonilla v. American Heritage Federal Credit Union, et al, under docket No.: 200401130. *See, Complaint*, attached as Exhibit “A.”

2. Plaintiff’s Complaint seeks damages against Defendants and alleges causes of action pursuant to, *inter alia*, the Truth in Lending Act, the United States Constitution, and laws of the United States. *See, Id.*, at ¶48 and VI. Prayer for Relief

3. Plaintiff’s lawsuit is removable from the State Court to this Court pursuant to 28 U.S.C. § 1441 because of federal question jurisdiction.

4. Venue is properly laid in this district pursuant to 28 U.S.C. § 1446(a) because the action sought to be removed is pending in this district. See, 28 U.S.C. § 1446(a).

5. This Honorable Court has jurisdiction over this matter because Plaintiff alleges that the events giving rise to her claims allegedly occurred in this district. 28 USC §1391(b).

6. The Complaint was the first pleading, motion, order or other paper from which it was ascertainable that the case meets the criteria for removal to Federal Court.

7. This Notice of Removal has been timely filed within thirty days of the date Defendants received the Complaint.

WHEREFORE, Defendants respectfully requests that the above-captioned action, now pending in the Court of Common Pleas of Philadelphia County, Pennsylvania, be removed therefrom to the United States District Court for the Eastern District of Pennsylvania.

RAWLE & HENDERSON LLP

By:

A handwritten signature in black ink, appearing to read "Nigel A. Greene", is written over a horizontal line.

Nigel A. Greene, Esquire
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Attorney for Defendants,
American Heritage Federal Credit
Union, Bruce Foulke (improperly
named as Bruce Foluke), and Danielle
Basich

Date: May 13, 2020

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

MERSADIES BONILLA	:	
Plaintiff	:	
v.	:	
AMERICAN HERITAGE FEDERAL CREDIT	:	
UNION; BRUCE FOLUKE; DANIELLE	:	
BASICH; and	:	CIVIL ACTION NO. – LAW
BRANCH MANAGER UNKNOWN	:	
Defendants ,	:	
	:	

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Notice of Removal to Federal Court was served upon the below-listed party by First Class U.S. Mail on May , 2020:

Mersadies Bonilla
921 Pleasant Valley Avenue #307
Mount Laurel, NJ 08054

RAWLE & HENDERSON LLP

By:



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Union, Bruce Foulke (improperly
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